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7 Attorney for Jose Daniel Moreno-Pina

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JOSE DANIEL MORENO-PINA,
14 Defendant.
15

Case No. 2:18-cr-00014-RFB-NJK

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(Fourth Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between
17 Nicholas A. Trutanich, United States Attorney, and Susan Cushman, Assistant United
18 States Attorney, counsel for the United States of America, and Rene L. Valladares,
19 Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal Public
20 Defender, counsel for Jose Daniel Moreno-Pina, that the Sentencing Hearing currently
21 scheduled on December 3, 2019 at 1:30 p.m., be vacated and continued to a date and time
22 convenient to the Court, but no earlier than sixty (60) days.

23 The Stipulation is entered into for the following reasons:

24 1. Mr. Moreno-Pina was involved in a car accident on April 28, 2019, and suffered
25 extensive medical injuries. Mr. Moreno-Pina has started to learn to walk again. However, his
26 physician has recommended that he not travel for at least 30 days.

1 2. The parties seek a stipulation to allow Mr. Moreno-Pina to continue to receive
2 physical therapy to strengthen his ability to walk so that he will be able to travel to Las Vegas
3 for his sentencing hearing.

4 3. The defendant is not incarcerated and does not object to the continuance.

5 4. The parties agree to the continuance.

6 This is the fourth stipulation to continue filed herein.

7 DATED this 21st day of November, 2019.

8 RENE L. VALLADARES
9 Federal Public Defender

 NICHOLAS A. TRUTANICH
 United States Attorney

10 /s/ Nisha Brooks-Whittington
11 By _____

 /s/ Susan Cushman
 By _____

12 NISHA BROOKS-WHITTINGTON
13 Assistant Federal Public Defender

 SUSAN CUSHMAN
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOSE DANIEL MORENO-PINA,

7 Defendant.

Case No. 2:18-cr-00014-RFB-NJK

ORDER

9
10 IT IS ORDERED that the sentencing hearing currently scheduled for Tuesday,
11 December 3, 2019 at 1:30 p.m., be vacated and continued to February 6, 2020 at the
12 hour of 11:00 A. m.

13 DATED this 25th day of November, 2019.

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16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE
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